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COMMENT ON PETITION 8626

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3 May 1995

TO: Secretary, FCC

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Sir:

The petition of Mr. Fred Maia, W5YI ought to be rejected on its own insufficiencies. Mr Maia's claims that one way bulletins and code practice broadcasts are rendered unnecessary by available computer on-line services in the case of bulletins, and by computer teaching programs in the case of Morse Code instruction are both factually misleading, and in the case of Morse Code instruction basically untrue.

The case of bulletins is easily dealt with. While there are certainly many available on-line services, they are only available at significant cost, in equipment and subscription fees, and therefore unavailable to the bulk of both amateurs and other hobbyists who use the bulletins to follow the many subjects covered in the bulletins, from FCC proceedings to satellite data. Since the bulletins are often retransmitted by stations acting in relay, or in delayed repeat mode, often in Morse Code, they also give valuable drill to both senders and listeners. To forbid such broadcasts would place an onus on traffic nets that might discourage the forwarding of such messages.

The assertion that computer training programs make code practice unnecessary is completely untrue, in that the programs themselves are poor training aids, teaching more bad habits in copy than good ones, and even were they properly designed and correctly implemented would still be no substitute at all for direct off the air copy of extended sessions of morse code. I was an O5H in the U.S.A.S.A. for the better part of seven years, and can speak from experience. I have not found a single Morse Training Program that was written with any understanding of correct copy techniques, either with pencil and paper, or particularly with a keyboard. The program sold by Mr. Maia's company is a fine example of what is wrong.

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Unless the instructor using the program in the memorization phase of learning the code knows enough to disable key parts of the program, the instructional order and method is exceptionally confusing and discouraging. Further, the program encourages, if not demands instant response to each character, when in fact instant response is a reflex that is to be discouraged at all phases of copy, since facility in COPYING BEHIND is necessary for any sustained work or practical speed in copying Morse code. Early versions of the program on which Mr. Maia's program was based could not deal with copy behind at all, and his program is easily confused by copy sufficiently behind the sent text. It is impossible to copy either plain text or coded groups in proper format with his program since the programmer is not aware of proper format, and forgot to permit use of the enter key as a carriage return-double-line-feed. This means that attempts to keep proper format in coded groups, and to properly break up plain text messages into appropriate blocks is impossible, although it is the desirable way to teach code, right from its start. I am not aware of any other such programs that do not suffer from those problems, or even worse problems. (A new program on the market causes the sending of text to cease on seeing an enter key.) Further, because a particular packet program found it convenient to use *, + and = to SEND certain prosigns, it has become required in the teaching programs that those character substitutes be used to COPY those prosigns, which is of course flat wrong. Use of the period key to cover characters known to have been missed, an essential part of good keyboard copy, and good pencil copy, not only always produces error indications at the character sent, but also invariably in the characters that follow. Numerous other problems, common to ALL such training programs that I have seen suggest that people learn Morse Code copy in spite of these programs, not because of them.

Even should programmers take the apparently unthinkable step of consulting professional Code Technicians and bring their programs into reasonable conformance with good practice, drill from tapes, computers, or even a friendly ham sending code in the students presence is no substitute for copy of on the air transmissions of sufficient duration to produce real facility in copy. While the best place to copy code for such practice is in fact the Commercial bands, sustained transmissions within the Amateur bands is needed for practice, and especially for checking ones progress in speed and accuracy of copy.

For all these reasons Mr. Maia's petition ought to be rejected on its face, as being totally meritless, and based on nongerman, or factually untrue assertions.


Earl H Moreo, N6FXB